Spacecraft such as those in the GLOBALSTAR constellation are classic repeaters. Every Mobile-Earth Station (MES) operating in L-band will "transmit" to GLOBALSTAR satellites in view. While the Commission probably does not anticipate that LQP would first "authorize" transmissions from Odyssey MES to GLOBALSTAR space craft, literally, Section 25.136(b) requires such a result. Accordingly, the Commission should clarify Section 25.136(b) that it simply requires each user of an MES associated with this service to be authorized to transmit by one licensee.

B. <u>Milestones</u>. The Commission should clarify the specific authorization from which its implementation milestones must be counted. The Commission describes the milestone for construction of the first two satellites as "within one year of <u>unconditional grant</u> of its authorization," and the milestone for construction of the remaining satellites as "within three years of the <u>initial</u> <u>authorization</u>." <u>MSS Rules Order</u>, ¶ 189. In order to facilitate the development of the many benefits of MSS Above 1 GHz, the Commission should require licensees to commence construction (and coordination) as soon as they receive any authorization to commence construction, and so all milestones should run from a licensee's "initial authorization."

VI. <u>CONCLUSION</u>.

For the reasons cited above, LQP requests the Commission to grant this Petition and reconsider and/or clarify the rules and policies discussed above.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this the 21st day of November, 1994 I have caused copies of the foregoing Petition for Clarification and Partial Reconsideration to be served via hand delivery (indicated with *) or by first class mail, postage pre-paid, upon the following parties:

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